

**RANDAZZA**  
LEGAL GROUP

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**December 6, 2024**

**Via CM/ECF**

Hon. Andrew E. Krause  
The Hon. Charles L. Brieant Jr. Federal Building and United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601-4150

***Re: Project Veritas, et al. v. James O'Keefe, et al., No. 7:23-cv-04533  
Maxwell Settlement Status***

Dear Judge Krause,

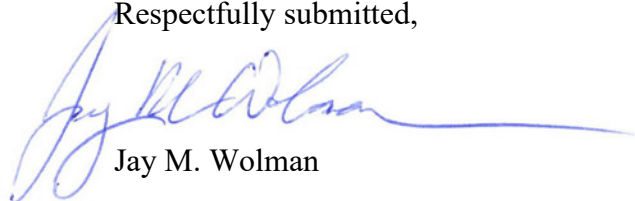
Pursuant to the order memorialized in the Minute Entry of October 22, 2024, Plaintiffs Project Veritas and Project Veritas Action Fund hereby file their letter regarding the status of their settlement with Defendant Maxwell.

Plaintiffs reached out to Mr. Maxwell on October 22 to follow-up on the proposed written agreement. Mr. Maxwell responded on November 8, 2024, with concerns regarding the language. Plaintiffs addressed the specific concern on November 12.

On December 4, Mr. Maxwell responded and raised an alternate proposal, different from the material terms agreed-upon at mediation. At this point, Plaintiffs anticipate moving to enforce the mediated agreement if Mr. Maxwell does not execute the proffered written agreement or, in the alternative, moving for entry of default.

Thank you for your attention to this matter.

Respectfully submitted,



Jay M. Wolman

cc: All Counsel of Record (Via CM/ECF)  
RC Maxwell <rc@rcmaxwell.com>